

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP
and LEADENHALL LIFE INSURANCE
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

vs.

JOSH WANDER, STEVEN PASKO,
KENNETH KING, 777 PARTNERS LLC,
600 PARTNERS LLC, SPLCSS III LLC,
SIGNAL SML 4 LLC, INSURETY AGENCY
SERVICES LLC, DORCHESTER
RECEIVABLES II LLC, SUTTONPARK
CAPITAL LLC, SIGNAL MEDICAL
RECEIVABLES LLC, INSURETY CAPITAL
LLC, SUTTONPARK SERVICING LLC, and
ADVANTAGE CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453-JGK

DECLARATION OF LEIGH M. NATHANSON

I, Leigh M. Nathanson, declare under penalty of perjury that the following statements are true and correct:

1. I am an attorney licensed and admitted to practice in the state of New York and a partner at King & Spalding LLP, counsel for Plaintiffs Leadenhall Capital Partners LLP and Leadenhall Life Insurance Linked Investments Fund PLC (collectively, "Leadenhall" or "Plaintiffs").

2. I submit this Declaration in support of Leadenhall's Opposition to Defendants' Motions to Stay Discovery.

3. Attached hereto as Exhibit A is a true and correct copy of a letter dated September

9, 2024 from me to John McCarthy, counsel for the 777 Entity Defendants.¹

4. Attached hereto as Exhibit B is a true and correct copy of a letter dated September 11, 2024 from Mr. McCarthy, counsel for the 777 Entity Defendants, to counsel for Leadenhall.

5. Attached hereto as Exhibit C is a true and correct copy of A-CAP and Kenneth King's First Set of Requests for Production of Documents to Plaintiffs, served on September 30, 2024.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 8, 2024

/s/ Leigh M. Nathanson
Leigh M. Nathanson

¹ Unless otherwise defined herein, capitalized terms are defined in Plaintiffs' Corrected Amended Complaint (ECF No. 187).